

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS SUSAN W. NEEDHAM
(OCA/USPS-T7-1-4)
(June 20, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,



GAIL WILLETTE
Director
Office of the Consumer Advocate



DAVID RUDERMAN
Attorney

POSTAL RATE COMMISSION
DOCKETED
JUN 20 1996
jm

OCA/USPS-T7-1. Refer to Table 1 on pages 3 and 4, and USPS-T-22, Exhibit 22-B (revised 11/21/90) from Docket No. R90-1.

- a. Please confirm that the cities listed in Exhibit 22-B for Category A and B level post office box charges ("surcharges") are the same cities that will be in the proposed fee Groups A and B. If you cannot confirm, please provide a list of cities in proposed fee Groups A and B.
- b. Please confirm that the ZIP Codes by city listed in Exhibit 22-B for Category A and B level fees ("surcharges") are the same ZIP Codes by city that will be in the proposed fee Groups A and B. If you cannot confirm, please provide a list of ZIP codes by city for proposed fee Groups A and B.

OCA/USPS-T7-2. Refer to Table 1 on pages 3 and 4.

- a. Please provide a list of ZIP Codes by state for proposed Group E post offices for which **no** city or rural delivery service is available and customers will "pay" proposed Group E fees of \$0.00.
- b. Please provide a list of ZIP Codes by state for proposed Group E post offices for which city or rural delivery service **is** available and customers will pay proposed Group D fees.

OCA/USPS-T7-3. Refer to pages 21 and 22 concerning "non-delivery" offices.

- a. What are the proposed box fees for residential and business customers domiciled within a Group E service area that are **not** eligible for any kind of delivery service who seek box service at another Group E post office?
- b. What are the proposed box fees for residential and business customers domiciled within a Group E service area that are **not** eligible for any kind of delivery service who seek box service at a Group D post office? Do such customers who seek box service at a Group D post office pay the Group D box fees, or the \$0.00 Group E box fees?
- c. Does the proposed non-resident fee apply to such customers?

OCA/USPS-T7-4. Refer to page 24 concerning the applicability of the "non-resident" fee.

- a. Does the proposed non-resident fee apply to customers of caller service?
- b. If you answer in the affirmative, does it apply on the same basis as the non-resident fee for box service customers?
- c. If it does not apply, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



DAVID RUDERMAN
Attorney

Washington, D.C. 20268-0001
June 20, 1996